

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INGENICO INC.,

Plaintiff,

v.

IOENGINE, LLC,

Defendant.

IOENGINE, LLC,

Counterclaim Plaintiff,

v.

INGENICO, INC., INGENICO CORP., and
INGENICO GROUP S.A.,

Counterclaim Defendants.

C.A. No. 18-826-WCB

VERDICT FORM

Instructions: When answering the following questions and filling out this Verdict Form, please follow the directions provided throughout the form. Your answer to each question must be unanimous. Please refer to the Jury Instructions for guidance on the law applicable to the subject matter covered by each question.

We, the jury, unanimously agree to the answers to the following questions and return them under the instructions of this Court as our verdict in this case:

I. INFRINGEMENT

1. For each of the following products, did IOENGINE prove by a preponderance of the evidence that Ingenico has directly infringed the Asserted Claims of the '969 Patent?

Writing "Yes" below indicates a finding for IOENGINE.

Writing "No" below indicates a finding for Ingenico.

Products	'969 Claim 3	'969 Claim 10
ROAM Products: G3X, G4X, G5X, Moby/3000, Moby/8500, RP350x, RP450c, RP45BT, RP45xBT, RP457c, RP750x	Yes	No
Telium Products: iSMP, iSMP Companion, iSMP4 Companion, iCMP	Yes	NO
Telium iSMP4	Yes	NO
Tetra Link/2500	Yes	NO

Continue to Question 2.

2. For each of the following products, did IOENGINE prove by a preponderance of the evidence that Ingenico has actively induced its customers who use the ROAM Pay X App to directly infringe the Asserted Claims of the '969 and '703 Patents?

Writing "Yes" below indicates a finding for IOENGINE.

Writing "No" below indicates a finding for Ingenico.

Products	'969 Claim 3	'969 Claim 10	'703 Claim 56	'703 Claim 90	'703 Claim 101	'703 Claim 105	'703 Claim 114	'703 Claim 124
ROAM Products: G3X, G4X, G5X, Moby/3000, Moby/8500, RP350x, RP450c, RP45BT, RP45xBT, RP457c, RP750x	Yes	NO	Yes	Yes	Yes	Yes	NO	Yes

Continue to Question 3.

3. For each of the following products, did IOENGINE prove by a preponderance of the evidence that Ingenico has actively induced its customers who do not use the ROAM Pay X App to directly infringe the Asserted Claims of the '969 and '703 Patents?

Writing "Yes" below indicates a finding for IOENGINE.

Writing "No" below indicates a finding for Ingenico.

Products	'969 Claim 3	'969 Claim 10	'703 Claim 56	'703 Claim 90	'703 Claim 101	'703 Claim 105	'703 Claim 114	'703 Claim 124
ROAM Products: G3X, G4X, G5X, Moby/3000, Moby/8500, RP350x, RP450c, RP45BT, RP45xBT, RP457c, RP750x	Yes	NO	Yes	Yes	Yes	Yes	NO	Yes
Telium Products: iSMP, iSMP Companion, iSMP4 Companion, iCMP	Yes	NO	Yes	Yes	Yes	Yes	NO	Yes
Telium iSMP4	Yes	NO	Yes	Yes	Yes	Yes	NO	Yes
Tetra Link/2500	Yes	NO	Yes	Yes	Yes	Yes	NO	Yes

Continue to Question 4.

4. For each of the following products, did IOENGINE prove by a preponderance of the evidence that Ingenico has contributed to direct infringement of the Asserted Claims of the '969 and '703 Patents by its customers who use the ROAM Pay X App?

Writing "Yes" below indicates a finding for IOENGINE.

Writing "No" below indicates a finding for Ingenico.

Products	'969 Claim 3	'969 Claim 10	'703 Claim 56	'703 Claim 90	'703 Claim 101	'703 Claim 105	'703 Claim 114	'703 Claim 124
ROAM Products: G3X, G4X, G5X, Moby/3000, Moby/8500, RP350x, RP450c, RP45BT, RP45xBT, RP457c, RP750x)	Yes	ND	Yes	Yes	Yes	Yes	ND	Yes

Continue to Question 5.

5. For each of the following products, did IOENGINE prove by a preponderance of the evidence that Ingenico has contributed to direct infringement of the Asserted Claims of the '969 and '703 Patents by its customers who do not use the ROAM Pay X App?

Writing "Yes" below indicates a finding for IOENGINE.

Writing "No" below indicates a finding for Ingenico.

Products	'969 Claim 3	'969 Claim 10	'703 Claim 56	'703 Claim 90	'703 Claim 101	'703 Claim 105	'703 Claim 114	'703 Claim 124
ROAM Products: G3X, G4X, G5X, Moby/3000, Moby/8500, RP350x, RP450c, RP45BT, RP45xBT, RP457c, RP750x	Yes	NO	Yes	Yes	Yes	Yes	NO	Yes
Telium Products: iSMP, iSMP Companion, iSMP4 Companion, iCMP	Yes	NO	Yes	Yes	Yes	Yes	NO	Yes
Telium iSMP4	Yes	NO	Yes	Yes	Yes	Yes	NO	Yes
Tetra Link/2500	Yes	NO	Yes	Yes	Yes	Yes	NO	Yes

Continue to Question 6 only for claims you have found were infringed in Questions 1, 2, 3, 4, or

5.

II. VALIDITY

Answer Question 6 only for claims you have found were infringed in Questions 1, 2, 3, 4, or 5.

6. Did Ingenico prove, by clear and convincing evidence, that the Asserted Claims of the '969 or '703 Patent are invalid for anticipation by the prior art? Answer this question only with respect to claims that you have found were infringed by Ingenico in Questions 1, 2, 3, 4, or 5.

Checking "Invalid" below indicates a finding for Ingenico.

Checking "Not Invalid" below indicates a finding for IOENGINE.

Claim		Invalid (for Ingenico)	Not Invalid (for IOENGINE)
'969 Patent	Claim 3	✓	
	Claim 10	N/A	N/A
'703 Patent	Claim 56	✓	
	Claim 90	✓	
	Claim 101	✓	
	Claim 105	✓	
	Claim 114	N/A	N/A
	Claim 124	✓	

Continue to Question 7.

Answer Question 7 only for claims you have found were infringed in Questions 1, 2, 3, 4, or 5.

7. Did Ingenico prove, by clear and convincing evidence, that the Asserted Claims of the '969 or '703 Patent are invalid for obviousness in light of the prior art? Answer this question only with respect to claims that you have found were infringed by Ingenico in Questions 1, 2, 3, 4, or 5.

Checking "Invalid" below indicates a finding for Ingenico.

Checking "Not Invalid" below indicates a finding for IOENGINE.

Claim		Invalid (for Ingenico)	Not Invalid (for IOENGINE)
'969 Patent	Claim 3	✓	
	Claim 10	N/A	N/A
'703 Patent	Claim 56	✓	
	Claim 90	✓	
	Claim 101	✓	
	Claim 105	✓	
	Claim 114	N/A	N/A
	Claim 124	✓	

Continue to the next page.

For the Jury:

7/15/22

Date



Jury Foreperson